
EXHIBIT B

UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

CD INTELLECTUAL PROPERTY)	
HOLDINGS, LLC)	
)	
Plaintiff,)	
)	Civil Action No. 05-414-JJF
)	
)	
AMAZON.COM, INC.,)	
)	
Defendant.)	

NOTICE OF 30(b)(6) DEPOSITION OF AMAZON.COM, INC.

PLEASE TAKE NOTICE THAT pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, commencing at 9:00 a.m. on March 8, 2006, or at such other date and time as shall be agreed upon by the parties or ordered by the Court, and continuing time to time thereafter, Plaintiff CD Intellectual Property Holdings, LLC will take the deposition upon oral examination of a representative or representatives of Amazon.com, Inc. concerning the subjects identified in Schedule A, attached. Please designate a representative or representatives at least ten business days prior to the deposition. The deposition shall take place at the offices of Ashby & Geddes, 222 Delaware Avenue, 17th Floor, Wilmington, Delaware 19899 or at such location as agreed to by the parties or as ordered by the Court. The deposition will be taken before an officer authorized by law to administer oaths, and will be recorded by stenographic and/or audiovisual means. You are invited to attend and cross-examine.

ASHBY & GEDDES

/s/ Tiffany Geyer Lydon

Steven J. Balick (I.D. #2403)
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Date: February 15, 2006

166708.1

SCHEDULE A

DEFINITIONS

CD incorporates herein the definitions from Cendant's First Set of Requests for the production of documents.

The term "customer purchase information" means any information and/or data related to a purchase made by a customer from Amazon.

TOPICS FOR TESTIMONY

1. Any method, system or process or product developed, implemented or used on the Amazon.com website for making a recommendation, including but not limited to the manner in which a recommendation is made, the customer act which triggers the recommendation or the revision of a recommendation, the date each method, system or process or product was first implemented and whether it is currently being used.
2. The design, development, implementation, operation, functionality and/or attributes of each Amazon.com customer recommendation feature.
3. The manner in which Amazon.com determines the effectiveness of each customer recommendation feature including but not limited to the criteria considered and the evaluation of that criteria.
4. For each customer recommendation feature ever implemented, the method by which Amazon determines (or could determine) whether a purchase was made as a result of a recommendation from Amazon.
5. The uses Amazon makes of its customer purchase information.

6. How Amazon collects and stores customer purchase information.
7. The date of conception, reduction to practice, and date of first public use of each customer recommendation feature by Amazon.

CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of February, 2006, the attached **NOTICE OF 30(b)(6) DEPOSITION OF AMAZON.COM, INC.** was served upon the below-named counsel of record at the address and in the manner indicated:

John W. Shaw, Esquire
Young Conaway Stargatt & Taylor
The Brandywine Building
1000 West Street, 17th Floor
Wilmington, DE 19801

HAND DELIVERY

Lynn H. Pasahow, Esquire
Fenwick & West, LLP
Silicon Valley Center
801 California Street
Mountain View, CA 94041

VIA FEDERAL EXPRESS

/s/ Tiffany Geyer Lydon

Tiffany Geyer Lydon

Discovery Documents

1:05-cv-00414-JJF Cendant Publishing Inc. v. Amazon.com Inc.

U.S. District Court

District of Delaware

Notice of Electronic Filing

The following transaction was received from Lydon, Tiffany entered on 2/15/2006 at 4:49 PM EST and filed on 2/15/2006

Case Name: Cendant Publishing Inc. v. Amazon.com Inc.
Case Number: 1:05-cv-414
Filer: CD Intellectual Property Holdings LLC
Document Number: 42

Docket Text:

NOTICE to Take Deposition of Amazon.com, Inc. on March 8, 2006 by CD Intellectual Property Holdings LLC.(Lydon, Tiffany)

The following document(s) are associated with this transaction:

Document description:Main Document

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1079733196 [Date=2/15/2006] [FileNumber=170202-0]
[02c9e832402ae4e39cdba180a7583a6288cd4f1497093fcac027b121fd59fbf3c872
b3bd20f10381554fe3d14e2899907b92e3e1478ba9a8af40b20860015fca]]

1:05-cv-414 Notice will be electronically mailed to:

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1:05-cv-414 Notice will be delivered by other means to: